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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

WALTER CHIRINO,  
also known as "Vengador,"

Defendant.

Walter Chirino  
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COMPLAINT AND  
AFFIDAVIT IN SUPPORT  
OF ARREST WARRANT

(T. 8, U.S.C., § 1326(b)(1))

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 30 2019 ★

LONG ISLAND OFFICE

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EASTERN DISTRICT OF NEW YORK, SS:

KENNETH LOPEZ, being duly sworn, deposes and states that he is a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement, duly appointed according to law and acting as such.

On or about December 19, 2019, within the Eastern District of New York and elsewhere, the defendant WALTER CHIRINO, also known as "Vengador," an alien who had previously been removed from the United States following a conviction for the commission of a felony, was found in the United States, without the Secretary of the United States Department of Homeland Security, successor to the Attorney General of the United States, having expressly consented to such alien's applying for admission.

(Title 8, United States Code, Sections 1326(b)(1))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE") and have been involved in the investigation of numerous cases involving the illegal reentry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record and his Immigration file; and from reports of other law enforcement officers involved in the investigation.

2. Immigration records reveal that the defendant WALTER CHIRINO, also known as "Vengador," is a citizen and national of El Salvador.

3. The defendant WALTER CHIRINO's criminal history indicates that he was arrested on June 15, 2001 in Suffolk County and charged with first degree robbery. The defendant's fingerprints were taken in connection with the aforementioned arrest. On August 9, 2001, the defendant pleaded guilty to third degree robbery, in violation of New York Penal Law Section 160.05, and was sentenced October 26, 2001, to six months in prison and five years' probation.

4. Thereafter, on November 30, 2007, the defendant WALTER CHIRINO, also known as "Vengador," was deported from the United States to El Salvador following a federal conviction for being a felon in possession of a firearm, in violation of 18

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

U.S.C. § 922(g). The defendant's fingerprints were taken in connection with his aforementioned deportation in November 2007.

5. On December 19, 2019, the defendant WALTER CHIRINO, also known as "Vengador," was arrested in Suffolk County, New York, pursuant to an indictment and arrest warrant filed in New York State Supreme Court, Suffolk County, charging the defendant with two counts of conspiracy, in violation of New York Penal Law Section 105.05(1). The defendant's fingerprints were taken in connection with the aforementioned arrest.

6. Thereafter, an ICE official with fingerprint analysis training compared the fingerprints taken in connection with the defendant's June 15, 2001 robbery arrest, his November 30, 2007 deportation to El Salvador, and his December 19, 2019 arrest in Suffolk County, and determined all three of the sets of fingerprints were made by the same individual.

7. A search of immigration records has revealed that there exists no request by the defendant for permission from either the United States Attorney General or the Secretary of the Department of Homeland Security to reenter the United States.

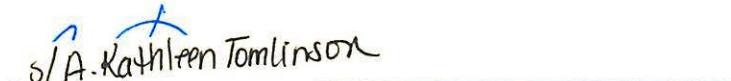
WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant WALTER CHIRINO, also known as "Vengador," and that he be dealt with according to law.

Finally, your deponent respectfully requests that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence and change patterns of behavior.



KENNETH LOPEZ  
Deportation Officer, United States Department of Homeland Security, Immigration and Customs Enforcement

Sworn to before me this  
30<sup>th</sup> day of December, 2019



THE HONORABLE A. KATHLEEN TOMLINSON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK